DANIEL G. BOGDEN 1 United States Attorney District of Nevada 2 ALLISON L. HERR Special Assistant United States Attorney 3 333 Las Vegas Boulevard South **Suite 5000** 4 Las Vegas, Nevada 89101 702-388-6336 5 UNITED STATES DISTRICT COURT 6 DISTRICT OF NEVADA -oOo-7 UNITED STATES OF AMERICA, 8 Case No.: 2:14-cr-00178-JAD-GWF Plaintiff, 9 STIPULATION TO CONTINUE MOTION **DEADLINES AND HEARING** VS. 10 (6th request) IAN PINCOMBE, 11 Defendants. 12 13 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden, United 14 States Attorney; Allison L. Herr, Special Assistant United States Attorney, counsel for the 15 United States of America and Jennifer Waldo, Esq., counsel for defendant Ian Pincombe, that 16 the deadline for the government to file its response to the Defendant's Motion to Dismiss be 17 continued to July 3, 2015, and that the hearing currently scheduled for June 22, 2015 at 1:30 pm 18 be continued for a period of 30 days. 19 This Stipulation is entered into for the following reasons: 20 The parties are in the midst of plea negotiations, which if successful would 21 obviate the need for the Defendant's Motion. These negotiations however have been 22 complicated by certain disputes over the factual averments to which the Defendant will be 23

pleading requiring time to research an negotiate language for the same.

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1	2.	The additional time request	ed is not sought for the purposes of delay, but to	
2	allow counsel sufficient time to complete negotiations.			
3	3. The parties agree to the continuance.			
4	4.	The defendant is in custody a	and does not object to a short continuance.	
5	5.	Denial of this request could	result in a miscarriage of justice. The additional	
6	time requested by this Stipulation is excludable in computing the time within which the tria			
7	herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code			
8	§3161(h)(7)(A), considering the factors under Title 18, United States Code §3161(h)(7)(B) and			
9	§ 3161(h)(7)(B)(iv).			
10	6.	This is the <u>sixth</u> request to co	ntinue the hearing.	
11	DATED this 19th day of June, 2015.			
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13	United States Attorney Attorney for Defer		JENNIFER WALDO	
14			Attorney for Defendant	
15	Ry: /s/ Alliso	n Harr	By: /s/Jennifer Waldo	
16	By: /s/ Allison Herr ALLISON L. HERR Special Assistant United States Attorney		JENNIFER WALDO	
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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,) Case No.: 2:14-cr-00178-JAD-GWF
Plaintiff,)) FINDINGS OF FACT, CONCLUSION OF) LAW AND ORDER)
vs.	
IAN PINCOMBE,	
Defendants.)))

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby finds that:

- 1. The parties are in the midst of plea negotiations, which if successful would obviate the need for the Defendant's Motion. These negotiations however have been complicated by certain disputes over the factual averments to which the Defendant will be pleading requiring time to research an negotiate language for the same.
- 2. The additional time requested is not sought for the purposes of delay, but to allow counsel sufficient time to complete negotiations.
 - 3. The parties agree to the continuance.
 - 4. The defendant is in custody and does not object to a short continuance.
- 5. Denial of this request could result in a miscarriage of justice. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code \$3161(h)(7)(A), considering the factors under Title 18, United States Code \$3161(h)(7)(B) and \$3161(h)(7)(B)(iv).

1	THEREFORE, IT IS HEREBY ORDERED that the deadline for the government to file
2	its response to the Defendant's Motion to Dismiss be continued to July 3, 2015, and that the
3	hearing currently scheduled for June 22, 2015 at 1:30 pm be continued for a period of 30 days
4	to Monday, July 27, 2015 at 1:30 p.m.
5	DATED this 19th day of June , 2015.
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7	Jeorge Foliy Jr.
8	GEORGÉ FOLEY, GR. United States Magistrate Judge
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